

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

UNITED STATES OF AMERICA,

Plaintiff,

v.

ZACKARY ELLIS SANDERS,

Defendant.

Case No. 1:20-cr-00143  
The Honorable Judge Ellis  
Trial: November 17, 2020

**UNOPPOSED MOTION TO CONTINUE TRIAL  
AND WAIVER OF SPEEDY TRIAL RIGHTS**

Zackary Ellis Sanders, by and through undersigned counsel, respectfully submits this Unopposed Motion to Continue his Trial, currently set for November 17, 2020, to a date that is convenient for the Court in January<sup>1</sup> or February 2021. Mr. Sanders agrees to a waiver of his right to speedy trial up to and including his new trial date. The government does not oppose this Motion and defers to the Court.

1. On July 10, 2020, Mr. Sanders was arraigned and trial was scheduled for November 17, 2020.
2. This is the first trial setting and Mr. Sanders waives his Speedy Trial Rights between the date of this motion and a subsequent trial date in January or February 2021.
3. Mr. Sanders respectfully submits that a continuance of the trial is necessary for several reasons. First, Mr. Sanders and the defense received the Court's Memorandum opinion the morning of October 27, 2020, denying Mr. Sanders's Motion to Suppress and Motion

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<sup>1</sup> The defense is in trial in another case in the Eastern District of Virginia from January 19 to 22, 2021.

for a *Franks* Hearing. Additional time is required for the defense to explore plea negotiations and to advise Mr. Sanders accordingly.

4. Second, Mr. Sanders could not be prepared to proceed to trial on November 17, 2020, as that would have unfairly required him to invest significant financial resources preparing for trial when a dispositive motion was pending.
5. The Government, through Assistant United States Attorneys Jay Prabhu and William Clayman, graciously do not oppose the requested continuance.

Dated: October 28, 2020.

Respectfully submitted,

/s/ Jonathan Jeffress

Jonathan Jeffress (#42884)  
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*Counsel for Defendant Zackary Ellis Sanders*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 28th day of October 2020, the foregoing was served electronically on the counsel of record through the U.S. District Court for the Eastern District of Virginia Electronic Document Filing System (ECF) and the document is available on the ECF system.

/s/ Emily Voshell  
Emily Voshell

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**[PROPOSED] ORDER TO CONTINUE TRIAL**

This matter is before the Court on Mr. Sanders's Unopposed Motion to Continue Trial. Based on the reasons stated therein, the lack of any opposition from the Government, and for good cause shown, the Motion to Continue Trial is **GRANTED**; and it is further **ORDERED** that the trial currently set for November 17, 2020, is hereby continued until: \_\_\_\_\_, 2021.

\_\_\_\_\_  
THE HONORABLE JUDGE ELLIS

UNITED STATES DISTRICT COURT JUDGE

Date: \_\_\_\_\_